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Via ECFHon. Philip M. Halpern, U.S.D.J.
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse
300 Quarropas St.
White Plains, NY 10601-4150Re: *Wolf, et al. v. Dolgen New York, LLC*
Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”), and Defendant Dolgen New York, LLC (“Dollar General”, the parties collectively, the “Parties”), through their undersigned counsel, submit this joint letter with a status update regarding settlement in accordance with Your Honor’s order provided at the August 29, 2024 in-person hearing.

On August 26, 2024, the Wolfs tendered their latest demand to Dollar General. On September 9, 2024, Dollar General responded with an counteroffer. The Parties conducted a call on September 11, 2024 to discuss Dollar General’s latest offer.

As briefly discussed at the August 29 hearing, the Parties have re-engaged the services of the Honorable Morton Denlow (Ret.), with whom the Parties previously participated in an unsuccessful mediation. Both Plaintiffs’ counsel and Dollar General’s counsel have separate calls scheduled with Judge Denlow on September 16. Such calls would have occurred sooner, but Judge Denlow has been out of the office on vacation.

Respectfully submitted,

THE DANN LAW FIRM, PC**MCGUIREWOODS LLP**/s/ Javier L. Merino

Javier L. Merino, Esq.

Counsel for Plaintiffs and the Putative Class/s/ Philip A. Goldstein

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